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ABSTRACT

This study focuses on the current practices of summer programs funded under Title I of the Elementary and Secondary Education Act. Information provided includes the types of programs that have been implemented, the populations they serve, and the programs' costs. Data presented from a national survey as well as from individual State education agency reports suggest that Title I summer programs are neither widespread nor increasing in number. Information gathered from Wisconsin, Georgia, and Oregon, indicates that existing programs tend to be conducted at the elementary school level, are academically oriented, and run for approximately six weeks each. Staff and student attitudes are described as generally positive. In addition, a number of legal considerations particular to Title I summer programs are discussed, including: (1) student eligibility and selection criteria; (2) the programs' geographical locations and reach; and (3) the absence of a normal State or local contribution to summer programs, which creates difficulties in applying the prohibitions of supplanting and other related rules. It is concluded that Title I summer programs generally provide as much or more instruction than school year programs at less cost per student. (Author/GC)

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A DESCRIPTIVE STUDY OF TITLE I SUMMER PROGRAMS

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EXECUTIVE SUMMARY

Recent research on the effectiveness of ESEA Title I programs in increasing achievement has suggested that the summer may be a critical period of time. Specifically, the research indicates that while programs may be successful in raising achievement gains during the school year, these gains may not be sustained over the summer months. Although current research findings are inconclusive on this issue, Title I-eligible children seem at a minimum to experience an achievement loss over the summer relative to other children. Since a major goal of Title I is to increase the academic futures of educationally disadvantaged students in the hope of broadening opportunities for them, it is important to consider alternative strategies for attaining the goal of sustained effectiveness for Title I programs. One such alternative is the expansion of Title I support for summer schools.

This study was undertaken for the purpose of determining what practices currently exist in Title I summer programs. The primary purpose is descriptive--to determine what types of Title I summer programs are underway, what population is served, how much they cost, and other relevant descriptors. In addition the study considers certain legal impediments in the current Title I authority which may have the effect of discouraging districts from using Title I funds for summer programs.

The study consisted of accumulating existing descriptive information on Title I summer programs at the national, state, and local levels. Three states were then selected for intensive study. For each of these states, we obtained descriptive information on Title I summer programs in the state and visited a total of eleven local programs to verify the descriptive information we had received and to obtain more detailed descriptions of their actual practices.

Synthesizing the information from the national, state, and local levels, the following picture of current practices in Title I summer

programs emerges. Nationally, fewer than 15% of all Title I districts have Title I summer programs and this figure appears to be on the decrease. With increasing instructional costs, the summer component is one of the first things to go, although a few districts value them sufficiently to shorten the length of their summer program rather than abolishing it completely.

Title I summer programs range from those that provide a highly academic, six-hour-a-day program to those that emphasize day camps and field trips, with almost all the programs more like the former than the latter. Based on local program applications, we conclude that almost all programs claim to be academic. Through site visits to eleven districts we were able to verify that activities conducted by actual projects were consistent with the descriptions presented in Title I applications. The programs average five or six weeks in length and generally run from two to four hours per day. The majority of programs serve students in some or all of grades one through six.

We found that summer programs generally provide as much or more instruction than the school-year programs, usually at less cost per student per hour of instruction, although there is large variation in these figures.

One of the major problems encountered in local summer programs is reaching all the students recommended for participation in the summer program. Districts need incentives with which to attract these students to summer school. Similarly, coordination of the summer program with the preceding and following school-year programs is a key element which poses a challenge to Title I staff-but one which is generally recognized. An additional problem is that summer programs tend to be staffed by non-Title I teachers, often resulting in a staff unfamiliar with the participating students.

Our analysis of the Title I law and regulations pertaining to the operation of summer programs concludes that although summer school activities have on several occasions been identified as operating out of compliance with Title I rules this need not be the case. Title I programs may be undertaken during the summer months without running afoul of the

Title I legal framework so long as sufficient attention is paid to the special implementation of these rules--particularly those pertaining to student selection and to the prohibition against supplanting.

Although we did not measure the impact of the summer programs, the reports of academic achievement from staff and students were generally positive. Summer school is viewed by local educators as a way of providing intensive instruction which at the least is judged to keep students from falling further behind. It is also viewed as a way of improving the attitudes of students towards school and hence their motivation. Teachers also noted that a difference could be seen in the beginning of the regular year between students who had and had not participated in a summer program. Finally, with a few exceptions, summer programs provide a pleasant environment for students both in terms of facilities and atmosphere.

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I INTRODUCTION

Recent research on the effectiveness of ESEA Title I programs in increasing the achievement of disadvantaged children has suggested that the summer may be a critical period of time. Although not conclusive, analyses of longitudinal data from compensatory education programs indicate that while programs may be successful in raising achievement gains during the school year, these gains are not uniformly sustained over the summer months (David and Pelavin, 1977; Pelavin and David, 1977). Neither data from local and state Title I evaluation reports nor data from statewide testing programs provide strong evidence of sustained effectiveness of Title I when measured over more than one year. Since a major goal of Title I is to increase the academic futures of educationally disadvantaged students in the hope of broadening opportunities for them, it is important to consider alternative strategies for attaining the goal of sustained effectiveness. The encouragement of Title I summer programs is one possible strategy meriting review.

This study was undertaken for the purpose of determining what practices currently exist in Title I summer programs. The primary purpose therefore is descriptive--to determine what types of Title I summer programs have been launched, what populations are served, how much they cost, and other relevant descriptors. Although an initial goal of this review was to ascertain the impact of the summer programs on achievement, adequate data for such a determination were not available.

The study consisted of accumulating existing descriptive information on Title I summer programs at the national, state, and local levels. Since little information exists in writing, we selected a sample of three states (Oregon, Wisconsin and Georgia) for intensive study. For each of these states, we obtained descriptive information on Title I summer programs in the state and visited three or four programs to verify the descriptive information and to obtain more detailed descriptions of their practices.

Section II of this report presents the information obtained at the national level (including information gleaned from the state Title I reports). Section III contains the results of the statewide survey of the three-state sample. Section IV presents the case study findings from the site visits. Since cost considerations are a major concern and are often complicated in terms of comparisons between school-year and summer program costs, the cost data are presented separately and discussed in Section V. Because the organization and administration of summer programs differ from school-year programs in significant ways, Section VI considers the implications of certain Title I rules for the operation of summer programs. Section VII contains a summary of the findings in terms of what might be expected if additional funds were available for Title I summer programs.

II TITLE I SUMMER PROGRAMS ACROSS THE NATION

There is no comprehensive documentation at the Federal level on current practices in Title I summer programs. We therefore turned to two alternative sources of data. The first is the information obtained in the national survey carried out by the National Institute of Education (NIE) in their Congressionally mandated Compensatory Education Study. The second source is the Title I reports produced annually by each state education agency (SEA) for the Office of Education.*

The national survey conducted under the direction of NIE was designed "to describe the services delivered under the rubric of compensatory education, what the recipients of these services are like and how they are selected, and how the services are planned, delivered, and evaluated by the school districts receiving compensatory education funds" (NIE, 1976). The survey, based on a nationally representative sample of school districts, included a series of questions related to the provision of services in Title I summer programs.

From the survey data, we found that 14.5% of all Title I districts have a Title I summer program (2,003 districts out of 13,841 districts). The districts with summer programs were compared to those without on three contextual factors: non-Federal per pupil expenditure, average family income, and size of school enrollment. Data indicated that districts with summer programs tended to have lower non-Federal per pupil expenditures and lower average family incomes than districts without summer programs, but they did not differ on size of school enrollment.

Reading is taught in approximately half of the summer programs, as are math and language arts. (These are not mutually exclusive and the

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*Additional information on the effectiveness and cost-effectiveness of summer school programs is expected to be available by the end of 1980 from the Office of Education's study of the Sustaining Effects of Compensatory Education.

extent of the overlap was not determined.) Social studies and English are each provided in approximately one-quarter of the programs. The summer programs are heavily concentrated in pre-kindergarten through sixth grade with slightly fewer in pre-kindergarten and kindergarten than in grades one through six. There are practically no Title I summer programs in grades seven through twelve. The programs provide, on the average, 20 to 40 minutes of instruction per day in each subject taught.

In the absence of any other national sources of data on the prevalence of characteristics of Title I summer programs, we turned to the SEA Title I reports for the years 1974 through 1977. From the reports in which information on summer programs was reported separately, we obtained the percent of the Title I budget spent on summer programs and counts of the number of districts with school-year programs, with summer programs, and with both types of programs.* These data are presented in Table 1.

The entries in Column I, percent of state's Title I budget for LEAs spent on summer programs, suggest a decreasing emphasis on summer programs since 1974. Although the data are far from complete, the overall trend from 6.9% of the budget in 1974 to 4.8% in 1977 is also reflected in ten of the thirteen states for which there are at least two years of data.

Columns II, III and IV contain the numbers of districts offering summer programs, the number offering school-year programs, and their overlap where available. These figures also suggest a declining emphasis on summer programs with most states showing a decrease in the number of districts with summer programs across years. Column IV contains the overlap figures which indicate that few districts have summer programs only. The vast majority of districts with summer programs also have school-year programs.

Overall, data on the national picture are sketchy, but there is enough information to suggest that Title I summer programs are not widespread and that the trend seems to be towards a decrease in emphasis on

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*We also obtained per pupil expenditures of school-year and summer programs. These data are discussed in Section IV.

Table 1

OPERATION OF TITLE I SUMMER PROGRAMS AS REPORTED BY SEAs

State	Year	I % of Budget for Summer Programs*	Number of Districts Operating Title I Program II Summer	III School-Year	IV Both
Alabama	1977	5%	12	126	--§
Arizona	1975	7	45	136	36
	1976	7	54	142	51
	1977	11	55	149	48
Arkansas	1974	2†	32	372	32
	1975	2†	26	362	26
	1976	2†	22	393	22
	1977	2	22	377	21
Georgia	1974	9	46	188	46
	1975	7	39	188	39
Hawaii	1974	6	3	10	3
Kansas	1977	7	102	253	80
Louisiana	1974	3	20	66	--§
	1975	4	21	66	--§
	1977	2	19	66	--§
Missouri	1974	16	146	388	121
	1975	16	147	335	124
	1976	12	144	347	122
Nebraska	1974	11	44	260	--§
	1975	7	48	256	--§
	1976	4	39	257	--§
	1977	5	40	252	--§

*"Budget" as used here refers to the total Title I budget available for allocation to LEAs.

†Summer school costs were calculated for instructional services and support services only. Thus this figure is an underestimate.

§Not reported.

Table 1 (Continued)

State	Year	I % of Budget for Summer Programs*	Number of Districts Operating Title I Program II Summer	III School-Year	IV Both
New Hampshire	1974	1%	28	69	12
Ohio	1974	9	89	571	63
Oregon	1974	9	88	226	--§
	1975	10	83	223	--§
	1976	10	98	255	--§
	1977	10	66	257	--§
Rhode Island	1974	5	10	44	--§
	1975	1	6	46	6
South Carolina	1974	4	23	117	23
	1975	3	16	108	16
	1976	2	12	92	12
	1977	1	11	92	11
South Dakota	1974	6	--§	--§	--
	1975	3	18	189	--§
	1976	2	12	191	--§
	1977	2	3	186	12
Tennessee	1975	4	19	146	19
	1976	3	19	145	--§
Texas	1974	6	133	1,011	--§
	1975	9	133	1,013	--§
	1976	5	112	1,012	--§
	1977	4	103	1,011	--§
Vermont	1974	6	19	74	19

*"Budget" as used here refers to the total Title I budget available for allocation to LEAs.

†Summer school costs were calculated for instructional services and support services only. Thus this figure is an underestimate.

§Not reported.

Table 1 (Concluded)

State	Year	I % of Budget for Summer Programs	Number of Districts Operating Title I Program II Summer	III School-Year	IV Both
Wisconsin	1974	10%	135	372	132
	1975	9	142	372	136
	1976	5	140	386	138
	1977	4	113	391	112

Mean 1975 (n=15) 6.9%
1975 (n=13) 6.3%
1976 (n=10) 5.2%
1977 (n=11) 4.8%

*"Budget" as used here refers to the total Title I budget available for allocation to LEAs.

†Summer school costs were calculated for instructional services and support services only. Thus this figure is an underestimate.

§Not reported.

summer programs. This trend is consistent with the need of many districts to limit the scope of Title I programs to accommodate increasing costs. The trend is perhaps also a reflection of the relative ease with which a summer component can be eliminated when a district finds it necessary to cut back its overall expenditures.

III TITLE I SUMMER PROGRAMS IN THREE STATES

To obtain more information on the characteristics of Title I summer programs, we chose three states for further study: Wisconsin, Georgia, and Oregon. We felt that information from three states would provide a reasonable basis for determining the range and variation of summer program practices. The three states were arbitrarily chosen from among those states with relatively high percents of their Title I budgets spent on summer programs. For each of the three states, we used as our data source local education agency (LEA) applications to the state for Title I funds. In Oregon we perused a random half (41) of the total number of applications for Title I summer school funds (a total of 83). In Wisconsin, we reviewed every other application: 75 out of 140. In Georgia, we read 18 of the 27 summer program applications. From these we were able roughly to characterize the summer programs in terms of type of program, length of program, and grade levels served.

We classified the summer programs according to whether their written descriptions indicated that the program was primarily academic or nonacademic. We treated programs that were exclusively pre-kindergarten or kindergarten separately since it is more difficult to define "academic" for young children. Table 2 presents, by state, the number and percent of each state's summer programs that fall into three classifications: those that are not exclusively pre-kindergarten or kindergarten, those that are, and those for which sufficient information was not available to make a determination about type of program. Those programs not exclusively pre-kindergarten or kindergarten are classified as academic or nonacademic. The data show that 29% of the summer programs in Wisconsin are pre-kindergarten or kindergarten, while the programs of the other two states serve older children. With regard to the academic or nonacademic character of the programs above kindergarten, the overwhelming majority of programs in all three states (86%, 83%, and 100%) were judged by their descriptions to be academically oriented.

Table 2

TYPE OF TITLE I SUMMER PROGRAMS PROPOSED IN LEA APPLICATIONS

Type of Program	Oregon (n=41)	Wisconsin (n=75)	Georgia (n=18)
Number and percent of programs not exclusively pre-kindergarten or kindergarten	36 (88%)	53 (71%)	17 (94%)
Number and percent academic	31 (86%)	44 (83%)	17 (100%)
Number and percent non-academic	5 (14%)	9 (17%)	0 (0%)
Number and percent of programs exclusively pre-kindergarten or kindergarten	0 (0%)	22 (29%)	1 (6%)
Number and percent of programs with insufficient information to classify	5 (12%)	0 (0%)	0 (0%)

We then classified each program, by state, into the length of the program in weeks and the type of program. Table 3 presents this information. Looking first at the totals for each state, we find that most programs are about six weeks long with four weeks and five weeks as the next most frequent length. Looking at data for each state, we find a slight tendency for preschool programs to be a little shorter in length. Comparing the states, we observe that the programs in Georgia tend to run a little longer on the average than in the other two states.

Finally, we were able to determine the grade levels served by each summer program. Table 4 presents these data by state and by grade level. Each entry is the percent of all Title I summer programs in the state that serve a given grade level. Thus, for example, in Wisconsin 63% of the summer programs serve students in first grade, while only 12% of the program serve students in eighth grade. In Oregon, only

Table 3

LENGTH OF TITLE I SUMMER PROGRAM BY PROGRAM TYPE
(Number of Programs in Each Category)

Type of Program	Number of Weeks								
	2	3	4	5	6	7	8	9+	NA
Oregon									
Academic			4	7	14	1			5
Non-academic				2	1		1	1	
No information				1	4				
Total			4	10	19	1	1	1	5
Wisconsin									
Academic			8	3	31				2
Non-academic					8	1			
PK/K only	1		7	4	9	1			
Total	1		15	7	48	2			2
Georgia									
Academic			1	1	9	2	3	1	
Non-academic									
PK/K Only					1				
Total			1	1	10	2	3	1	

Table 4

GRADES SERVED BY TITLE I SUMMER PROGRAMS
(Percent of all Title I summer programs in state)

State	n	PK	K	1	2	3	4	5	6	7	8	9	10	11	12
Wisconsin	75	67%	51%	63%	63%	61%	53%	44%	37%	15%	12%	8%	8%	7%	5%
Oregon	41	8	17	72	83	92	86	83	81	47	36	31	28	22	14
Georgia	18	0	22	83	89	94	72	61	61	39	28	6	6	0	0
Unweighted Mean Percent		25	30	73	78	82	70	63	60	34	25	15	14	10	6

8% of the programs serve pre-kindergarten while 92% serve third graders. Similarly in Georgia, 94% of the programs serve third graders as compared to 22% in kindergarten and 6% in ninth grade. In Wisconsin, the greatest emphasis is on serving students in pre-kindergarten through third grade with a secondary emphasis on grades four through six. In Oregon and Georgia, the vast majority of the programs serve students in grades one through six. The last row presents the unweighted average across the three states to give an approximate idea of relative emphasis.* These figures suggest that summer programs tend to focus first on students in grades one through six, with about half as many serving students in prekindergarten and kindergarten and grades seven and eight.

In summary, from the LEA applications in these three states, we conclude that most summer programs are academically oriented as judged by their written descriptions, that the programs tend to run about six weeks, and that the programs are predominantly in grades one through six.

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*We limited ourselves here and throughout to simple averages since the intent is to communicate general trends, not precise, nationally representative statistics. With this goal, and a purposive sample of three states, the development of a weighting scheme seemed inappropriate.

IV TITLE I SUMMER PROGRAMS IN ELEVEN DISTRICTS

In addition to collecting information at the state level for Oregon, Wisconsin, and Georgia, we visited a total of eleven programs in those states during their operation in the summer of 1977.* The purpose of these visits was first to validate our categorization of programs as academic or nonacademic, as determined initially by the program descriptions in the local Title I applications. The second purpose was to obtain more detailed information on the operating characteristics of the programs, since the information on the project applications was often quite sketchy.

First and foremost we found that our classifications of program types were accurate. Programs described in their applications as academic were in fact academic (ten of the eleven visited). This lends validity to our conclusions based on the state reports in Section III. Basic factual information on the eleven programs visited is contained in Table 5. The columns are described below under the following headings: Grade Level (Column I), Amount of Instruction (Columns II, II, IV and V), Participants (Column VI), and Staffing (Columns VII, VIII, and IX).

Grade Level

Column I shows the grades served by each program, supporting the conclusion stated above that the greatest emphasis in summer programs tends to be on grades one through six. Staff in several districts mentioned

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*The programs were selected on the basis of their potential for providing achievement data, the dates of the summer program and the willingness of the district to cooperate. An initial goal of the study was to obtain data that would permit estimates of the impact of summer school on achievement. Unfortunately, even by selecting districts with a minimum of fall and spring tests, we were not able to obtain scores on a sample large enough to support analysis.

Table 5

SELECTED CHARACTERISTICS OF ELEVEN TITLE I SUMMER PROGRAMS

Program	I Grades Served	II Length In Weeks	III Number Hours Per Day	IV Number Sessions	V Class Size	VI Number Students	VII Number Teachers	VIII Number Adult Aides	IX Number Student Aides
Oregon 1	K-6	6	1 1/2	3	10	130	5	3	2
Oregon 2	K-4	6	2 1/2	1	15	70	4	4	4
Oregon 3	1-6	6	2 1/4	1	10	120	19	0	0
Oregon 4	K-11	4	3	1	15	532	25	24	25
Georgia 1	1-4	7	3	1	12	1,000	80	0	0
Georgia 2	1-6	7	6	1	20 (Max)	580	28	28	6
Georgia 3	K-6	5	4 1/2	1	10-15	660	30	30	0
Georgia 4	3-6	8	5	1	18 (Max)	143	8	8	0
Wisconsin 1	PK-6	6	3	1	12-22	450	16	16	0
Wisconsin 2	K-5	6	1	3	8	115	7	6	0
Wisconsin 3	1-7	6	1 1/4	2	12	120	10	0	0

that it is more difficult to get older children into the program because they are lured by summer job opportunities.

Amount of Instruction

As the state data suggested, the average length of the programs visited was about six weeks, with the programs in Georgia tending to run a little longer (Column II). Column III contains the number of hours per day that each program lasted. These figures range from a low of one hour to a high of six hours, with most programs averaging about three hours. Table 6 compares the information we obtained on regular school-year and summer programs in these districts. We found that most school-year programs provide approximately one-half hour of instruction for Title I participants three to five days per week, generally in a pull-out setting. The table shows that summer programs involve considerably more hours per week. However, unlike school-year programs which offer instruction during a part of the school day, some portion of the time reported for Title I-funded summer programs may be spent in noninstructional activity such as breakfasts and recess. Additionally, summer Title I programs are usually the only kind of academic instruction provided during that period, whereas school-year Title I is provided in addition to base program courses; e.g., reading and math. Given these qualifications, the data indicate that summer school generally provides considerably more Title I instruction per day and per week than the school-year program in these districts.

As reported in Table 5, we found that most of the summer programs ran only one session (Column IV). A few, however, had multiple sessions generally serving one group of students from 8:00 to 10:00, for example, and a second group from 10:00 to 12:00. Comparing Columns III and IV shows that multiple sessions are associated with shorter programs in terms of hours per day.

Column V contains approximate figures for class size in the summer programs. Classes range from 8 to 22, with the average about 13 students per class. Again, compared to the school year, these are much smaller

Table 6

COMPARISON OF NUMBER OF HOURS THAT STUDENTS PARTICIPATE IN TITLE I SCHOOL-YEAR AND SUMMER PROGRAMS IN ELEVEN DISTRICTS

Program	Regular School Year			Summer		
	Hours/Day	Days/Week	Hours/Week	Hours/Day	Days/Week	Hours/Week
Oregon 1	1/2	4	2	1 1/2	5	7 1/2
2	No*	No*	No*	2 1/2	5	12 1/2
3	1/2	V	V	2 1/4	5	11 1/4
4	1/2	5	2 1/2	3	N.A.	N.A.
Georgia 1	1-3	5	10	3	5	1 1/2
2	2	N.A.	N.A.	6	5	30
3	N.A.	N.A.	N.A.	4 1/2	5	22 1/2
4	N.A.	N.A.	N.A.	5	5	25
Wisconsin 1	1/2	4	2	3	N.A.	N.A.
2	1/2	3-5	4	1	5	5
3	1/2	5	2 1/2	1 1/4	5	6 1/4

Key: No - No Title I program operated.
V - Number varies during year.
N.A. - Data not available.

*State Learning Disability funds are used to fund a pull-out program for 3/4 hour per day.

classes than regular school-year classes, but may be similar in size to small groups pulled out of regular classes for Title I services during the school year.

Participants

Column VI presents the number of participants in each of the summer programs, ranging from 70 to 1,000. Of more interest than absolute size, however, is the extent of overlap between school-year Title I participants and summer school participants. We are concerned with this overlap in the context of program continuity. Summer programs are more likely to affect student achievement if they are coordinated with school-year programs so that they provide a continuous educational program for individual students. This means that the summer school curriculum should be coordinated with the instructional programs of the school years between which it is sandwiched. Attempts to achieve such coordination, however, require that there are students who participate in both school-year and summer programs. The smaller the percentage of Title I students with continuous participation, the more difficult coordination becomes. This is particularly problematic when the Title I summer school enrollment is only a small fraction of the Title I school-year enrollment.

In each district we attempted to determine the extent of continuity between school-year and summer Title I participation. We could not obtain exact figures for any of the possible combinations of participation in a Title I summer program, the preceding school-year Title I program, and the following school-year Title I program. For most of the programs, we were able to determine only that "most" Title I summer school participants attended the preceding year's programs and "most" were expected to attend the following school-year program, where "most" ranged from 60% to 80%. We used these rough figures to estimate the minimum and maximum possible continuity across two school-year programs and the intervening summer program.

The estimate of minimum continuity is obtained by using the 60% figure and assuming minimal overlap between the two groups of summer

school participants: those who attended the preceding school-year program and those who will attend the following school-year program. The minimal possible overlap of these two groups, each representing 60% of all summer school participants, is 20% (120-100). Hence the worst possible case shows that only 20% of the summer school participants may be having a continuous Title I experience. On the other side, using the larger estimate of 80% and assuming maximum (total) overlap between the two groups defined above results in a far more positive picture--that 80% of the summer school participants are receiving a continuous Title I experience.

These calculations are intended only to communicate the possible range of the percent of summer school participants who attend Title I programs during the preceding and following school years. The estimates suggest that continuity may be a serious problem, particularly if the minimal estimate is a more accurate one. However, even if the maximum estimate of continuous participation is accurate, continuity remains a challenging problem <u>if</u> the total summer school enrollment is significantly smaller than the school year Title I enrollment.

Students are selected for summer school participation in much the same way as they are selected for participation in the school-year Title I program. Students are usually referred to summer school either by their regular or Title I school-year teacher. First priority for summer participation generally goes to students already in the school-year Title I program. One district was an exception in that it had a substantial number of Title I eligible students who were not served during the school year. Consequently, a special effort was made to reach these students during the summer. In all districts, the problem of recommended students not showing up was cited. In these cases, the summer programs are filled by students not in the school-year program and at times of questionable Title I eligibility.

<u>Staffing</u>

Columns VII, VIII and IX contain the number of teachers, adult aides, and student aides in each of the programs. All but three of the programs

employed approximately the same number of aides as teachers and, in addition, four used student aides (usually high school students). Teachers are generally selected from applications for summer school positions. Usually more apply than are accepted but most are not school-year Title I teachers. The reasons most frequently cited for this were: first, that Title I teachers are "burned out" by the end of the school year and, second, that Title I funds during the school year are usually spent on aides rather than teachers; hence, there is only a small pool of teachers funded by Title I and therefore identified as Title I teachers.

Some districts try to hire teachers with knowledge of and previous experience with Title I. Others specifically want to use non-Title I teachers in order to introduce them to the needs of disadvantaged students. The most frequent complaint about staffing was the problem of having a teacher totally unfamiliar with all the students and sometimes teaching a different grade level than he or she taught during the school year.

Conclusions and Impressions

From the visits to eleven programs, we found that most programs described as academic do in fact provide academic instruction as opposed to nonacademic activities such as arts and crafts. In fact, these programs provide considerably more insturction per day than the Title I school-year program in the same districts. The site visits included observations at a total of 29 different schools. From this total, our impression was that most are extremely pleasant places to be both in terms of physical environment and atmosphere. In several programs such factors as fans or air conditioning, student work decorating the building, comfortable reading areas, and other more intangible attributes (for example, one project supervisor knew each child's name) contributed to this impression. A total of ten schools, all located in two of the eleven districts, were of questionable comfort in terms of physical environment and atmosphere (for example, a non-air conditioned building in 105-degree weather, several groups of students doing different activities in the same noisy room, and instances of insufficient numbers of activities to keep all children occupied).

Of the eleven programs visited, approximately half were run by teachers or counselors as opposed to administrators. Our impression was that these programs were better organized and ran more smoothly, probably because these "summer directors" in their school-year capacity as teachers or counselors were already familiar with the students and the staff and tended to be in the school at all times and involved in the classroom activities.

Comments from summer school staff were generally positive. They commented that summer school helps students' attitudes and motivation. Staff also noted that in the fall following the summer program, Title I teachers claim that they see a difference in Title I students who did and did not participate in the summer program. They also feel that the students "get more for their money" in summer school because more intensive instruction is provided. On the negative side, the most serious problems cited were that teachers are often unfamiliar with the students, that the same materials are used over and over, and that students would have more incentive to attend if there were some sort of credit given for summer school participation. Staff also cited problems with coordinating the summer component with the school-year program. It is encouraging that there is concern with coordinating the programs; however, the concern was primarily directed towards coordinating the summer program with the previous school-year's program and little mention was made of coordination with the following year's program.

Overall, however, the general impression from both staff and students is that Title I summer programs provide not only a pleasant environment but also a significant amount of instruction without which, it is felt, the students would fall further behind.

V COSTS OF TITLE I SUMMER PROGRAMS

It is misleading to compare total costs of Title I summer programs to Title I school-year programs* because of substantial differences between the programs. School-year programs require expenditures over a nine-month period as opposed to a five- or six-week summer program. Summer programs, however, usually provide more Title I instruction per day and per week than school-year programs. Therefore, a more appropriate comparison of costs is the dollar amount per pupil per hour of services between Title I summer programs and Title I school-year programs.

To calculate this figure for summer programs, we increased our sample of states to insure regional representation. To Oregon, Wisconsin, and Georgia, we added Pennsylvania, New York, Texas, and California. We later eliminated California after ascertaining that the state had virtually no Title I summer programs. We telephoned the state administrative offices to obtain a list of approximately 20 districts that operated Title I summer programs in each state. In all states an attempt was made to choose districts that ranged from large to small and from urban to rural. This resulted in a list of 102 districts that were surveyed. We then called the district (speaking usually to the Title I coordinator or the district business manager) and asked how many students participated in the program, how long the program lasted (hours per day and number of days), and the cost of the program. The fiscal information included the figure reported as the direct cost of the program, the portion of the direct costs paid by Title I versus the portion contributed by other sources, and the major categories covered by the direct cost figure.

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*"School-year programs" as used here refers to the provision of supplementary services with Title I funds over and above base program services in the given subject matter.

Of the 102 districts surveyed, 78 paid 100% of the direct costs with Title I funds.* One district in Texas paid for the entire program with state compensatory funds and one district in New York paid for half of the program with state funds set aside to help pupils with special educational needs (PSEN). Two districts in Pennsylvania split the cost between Title I (85% and 34%) and the district's general fund (15% and 66%). Two districts in Oregon and one in New York used Federal funds allocated to P.L. 874, Public Housing Funds, to pay between 13% and 56% of the direct costs.

In looking at the distribution of costs across program accounts, we find that generally the instructional salaries and the cost of instructional materials are considered a direct cost and are paid by the Title I summer school account. The exception to this statement is a group of 10 districts which used supplies left from the regular school year and did not buy any materials specifically for Title I summer school. When transportation was provided (approximately 60% of the districts provided this service), some portion of the cost was usually covered by the Title I summer school account. The cost for administrative services was often split between Title I summer program and the non-Title I regular session account, although some districts used regular session Title I funds as well. Many of the districts didn't provide personnel or support services, a food program, or noontime supervision during the summer program, but those that did generally paid for them with Title I funds.

We did not receive information from all districts about the cost of maintenance or utilities. Of those districts for which information was available, most of them said the district, rather than Title I, bore the cost.

Table 7 contains a summary of the fiscal information for each of the six states. Column I shows the mean per pupil expenditure (PPE) and the range of such expenditures. These figures were calculated for each district

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*The other districts' figures were included because Title I summer programs were operated in the state overall and these programs were generally the same as the Title I-funded projects except for funding source.

Table 7

TITLE I SUMMER PROGRAM COSTS

State	I Total PPE Summer	II Total Number Days	III Number Hours Per Day	IV Cost Per Student Per Hour*
Georgia	$160	32.2	3.9	$1.32
(n=18)	$57-$252	20-45	2-6	$0.63-$2.10
New York	$124	25.2	2.1	$2.62
(n=16)	$27-$270	20-30	1-3.5	$1.22-$6.00
Oregon	$142	25.3	2.7	$2.42
(n=16)	$42-$370	16-40	.5-5	$0.51-$5.19
Pennsylvania	$122	25.4	3.5	$1.52
(n=17)	$32-$193	16-30	1-6	$0.38-$2.49
Texas	$118	26.2	4.2	$1.04
(n=19)	$17-$386	19-40	1-8.5	$0.43-$2.57
Wisconsin	$126	28.6	3.5	$1.30
(n=16)	$34-$350	20-30	3-6	$0.38-$3.00

*The averages reported in each column were calculated directly from the district data, therefore the averages in Column IV are not necessarily the same as if they had been calculated by dividing each Column I average by the product of the corresponding averages in Columns II and III.

in each state by dividing the total Title I summer program expenditures by the number of students served. The mean is an unweighted average of all the districts (the "n" represents number of districts per state for which there was complete information). Although the range for per pupil expenditures is quite large in all six states, the averages are remarkably similar, ranging from $118 to $160.

Column II contains the total number of days averaged across program length for each district and the accompanying range. These figures are also quite consistent across states and reflect an average (unweighted) program length of approximately five weeks. Column III presents the average number of hours per day of the program with the ranges below. The means range from a low of 2.1 hours per day to a high of 4.2 hours per day.

Column IV presents the average cost per student per hour in each summer program. These figures were calculated for each district by dividing the total per pupil expenditure by the total number of hours in the program (the number of days times the number of hours per day). These costs also vary considerably within each state but less so across states. The mean cost per student per hour for summer programs has a high of $2.62 and a low of $1.04 with a mean across states of $1.67.

It is this figure--the cost per student per hour--that we can now compare to the cost of school-year Title I programs. The high and low number of hours per week for school-year Title I programs are based on two sources. First, NIE's report on their Compensatory Education Study (NIE, 1976) finds that the average for a school-year Title I program is about six hours per week. Most schools operate for 36 weeks hence the total number of hours is 216. NIE also estimated that the national average per pupil expenditure for Title I programs is about $350. These two figures were used to calculate the "low cost" figure. Second, our estimates of average program length based on inquiries in the districts visited, revealed a substantially lower number of hours for school-year programs. We found that school-year programs provide from 20 to 30 minutes per day of instruction four or five days a week--a total of about two hours of instructional services per week or 72 hours per school year.

EPRC estimates confirm, however, the average per pupil expenditure for Title I to be $350. The estimates of two hours per week (see Table 6) and $350 were corroborated by the data gathered in this study on school-year programs in the districts visited. These figures are used to calculate the "high cost" figure.* Dividing the average cost per pupil by the total number of hours in the program, we arrived at the high and low estimates of costs per pupil per hour during school-year programs; $4.90 and $1.60, respectively.

The bottom half of the table presents the corresponding figures for summer programs based on the two states in Table 7 with the lowest and highest total number hours of services (the product of Columns II and III). These are New York with 52.9 hours and Georgia with 125.6 hours. These figures are quite rough but do suggest (contrary to general belief) that summer programs certainly are not more expensive than school-year programs per hour of services provided. Comparing the high cost figures in Table 8 for school-year and summer programs ($4.90 and $2.62, respectively), and the low cost figures ($1.60 and $1.32, respectively), it can be seen that summer programs are not more expensive and in fact, seem to be less expensive.

The point of presenting these figures is not to argue that Title I summer programs present a low-cost alternative to school-year Title I. School year programs are offered in such a way as to supplement base program instruction in academic subjects, and our data are not sensitive to such factors as pupil-teacher ratios or extent of individualization. However, this data does rebut the popular notion that Title I summer programs are substantially more expensive than Title I school-year programs. In fact, costs are in the same general range or even less for summer programs. When this is added to the evidence concerning the importance of a continuity of services for low-achieving children throughout the calendar year,

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*Variables such as type of staff involved, program design (e.g., heavier use of aides), and amount of planning time made available, will have a significant effect on the size of the figure representing total hours per week. We present both numbers to provide a better idea of the range.

the elimination of summer programs from a district's Title I budget should be seen as a cause for concern.

Table 8

COMPARISON OF COSTS BETWEEN TITLE I SCHOOL-YEAR AND SUMMER PROGRAMS

	High Cost	Low Cost
School-Year Programs		
Total hours	72	216
Average cost per pupil	350	350
Approximate cost per pupil per hour	$4.90	$1.60
Summer Programs		
Total hours	52.9	125.6
Average cost per pupil	124	160
Approximate cost per pupil per hour	$2.62*	$1.32*

*See Table 7.

VI LEGAL CONSIDERATIONS IN THE DESIGN OF TITLE I SUMMER PROGRAMS*

This section discusses several legal considerations pertaining to the design and operation of Title I summer programs. The term "legal considerations" is used for convenience to refer to constraints on local decision-making imposed by Title I law and regulations. Although all Title I programs--school-year or summer--are covered by the same rules, special consideration is necessary in the case of summer programs. This is true because summer school programs differ from regular-year programs in three ways which affect the application of particular Title I rules. Summer programs do not fall under states' compulsory attendance laws and thus special student selection problems arise because of the smaller potential group of participants. Related to this is the fact that having fewer eligible children willing to attend in each of the eligible attendance areas could create difficulties in determining the geographical reach of the project and its actual location. Finally, the absence of a "normal" state or local contribution to a base educational program creates difficulties in applying the prohibitions against supplanting and related rules.

Although specific summer school activities have, on several occasions, been identified as operating out of compliance with the Title I rules, this is not necessarily the case. We generally conclude that Title I programs may be undertaken during the summer months without running afoul of the Title I legal framework.

Present Title I rules make no express distinction between programs operated during the regular school year and those operated during the

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*This chapter was prepared by Harold R. Winslow, who wishes to acknowledge the contributions to it made by the studies of the Title I legal framework undertaken by the Legal Standards Project of the Lawyers' Committee for Civil Rights Under Law, and his conversations with Mr. Robert Silverstein of the Project. The conclusions and opinions stated, however, are those of the author.

summer months. There has been little reason to date to make such distinctions since the decision to have or not to have summer programs has been a local one. However, if it became Federal policy to encourage summer school in all or most districts receiving Title I money, various issues in applying the Title I rules would arise. Three of the areas in which these issues would arise are discussed in this section: application of the attendance area eligibility and targeting, student selection and retention, and the no-supplanting rules.

At this writing, the Congress has just passed the Education Amendments of 1978, P.L. 95-561. This legislation requires LEAs to give "due consideration" to means of sustaining gains made by participants "through such means as summer programs...". Parts of this legislation also will have a special effect on the operation of summer programs. Accordingly, while the text refers to existing (now prior) law, changes brought about by P.L. 95-561 affecting the discussion are described in footnotes to this section.

Attendance Area Eligibility and Targeting Rules

These rules are intended to assure that Title I services are provided in areas with high concentrations of low-income children. The "attendance area" is the geographical area in which the children who are normally served by a particular school reside (Section 116a.2*). In school-year projects, the attendance areas with low-income concentrations as high as the district-wide average are considered eligible.† The eligible attendance areas are normally ranked by their concentration of low-income students and are served in accordance with those rankings. The "project area" is an eligible attendance area or combination of such areas from which the participating students are to be drawn--regardless of where the services are physically to be provided (Section 116a.2).

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*Except as otherwise noted, section references are to sections of the Title I regulations (45 CFR, Parts 116 and 116a) as revised by 41 FR 42914 (September 28, 1976).

†This is the general rule to which there are certain exceptions not applicable to this discussion.

The potential difficulties with these rules in operating summer programs stem from the smaller group of potential summer participants in each eligible attendance area as compared to participants in the regular school-year program. In order to organize summer programs with sufficient summer participants, LEAs would likely want to combine children selected (and willing to participate) from more than one attendance area, locate the project at a convenient place, and locate a second group of children to participate on a space-available basis if necessary. Each of these things may be done consistent with Title I rules in the following manner:

1. The determination of the eligibility of an attendance area would be the same as for school-year programs; i.e., the area must have a percent or number of low-income children at least as high as the district average.

2. The "project area" could include all eligible attendance areas, e.g., to maximize the number of participants, so long as there is a sufficient restriction of areas to avoid jeopardizing the project's effectiveness (i.e., by diluting services). Section 116a.20(a).

3. The actual project could be conducted anywhere, even outside an eligible attendance area, so long as it is a place where the needs of the students will be "best served." Section 116a.19(c).

4. Children who do not reside in eligible attendance areas may be selected to participate in the program, but only if:

   a) they meet the educational criteria for participation (see below),

   b) their participation will not result in excluding eligible children that do reside in eligible areas,

   c) the project has been designed solely for children residing in eligible areas,

   d) their participation will not impair the effectiveness of the project and will not result in incurring additional costs.

   (Section 116a.22(b)(9)

From this, it appears that an LEA could make the summer school project area include all eligible attendance areas, centralize project operations in one school or resource center, and even bring in educationally eligible

children not residing in attendance areas with the highest concentrations of low-income children to fill spaces so long as the conditions in (4), above, are met.*

Student Selection and Retention Rules

Once the project area has been determined, educational criteria are used to select students from within it for participation in the program. The LEA decides the general instructional areas on which the program will focus and the general target groups. All "educationally deprived children" in the general targeted groups are to be identified and, from those, the ones in "greatest need" of Title I special assistance. These children in greatest need are the ones to be selected for participation. The 1976 regulations also provide for selection of children who participated in the prior year's program even though they are no longer in "greatest need" so long as they are still "educationally deprived" (116a.21).

As a practical matter, the "greatest need" rule as applied to summer programs (which would likely have to be voluntary), would mean that LEA officials would have to try first to get the lowest of the low achievers among the eligible group, then the next lowest, and so on until the desired number of students are enrolled. In no case may the program be offered on a "first come-first served" basis, e.g., to get the most-motivated students. In sum, there must be a selection of students, and it must be in order of educational needs.

In order to achieve the purpose of the Title I summer program to sustain achievement gains, it is necessary to maximize continuity with school-year programs. Including only those students who participated in the prior year's program for participation in the summer, however, is constrained by possible problems of enrolling an optimal number of students; a constraint which would argue against such limitations on summer school eligibility.

A further constraint pertains to the achievement level of prior-year participants. Under the current regulations, students who participated

*The relevant provisions of P.L. 95-561 basically affirm or leave untouched the 1976 regulations' treatment of the rules discussed.

in the prior year's program could be selected for the summer program only if they were either in "greatest need" or at least still "educationally deprived." This would preclude attendance of prior-year participants whose "level of educational attainment" had been "raised to that appropriate for children of their age," i.e., who were no longer "educationally deprived." (Section 116a.2.) A child may (based on achievement tests) no longer be "educationally deprived" (e.g., by having attained grade level equivalency) when judged on a fall to spring basis. The child may, however, experience a summer loss sufficient to reinstate his or her eligibility the subsequent year. The limitation of the retention rule described above (116a.21) would appear to prohibit participation of this child in the summer program. This result would defeat a primary purpose of the summer program where the child does, in fact, experience the summer loss.*

The No-Supplanting Rules

Perhaps the most troublesome of the legal issues involved in the operation of Title I summer programs is the application of the no-supplanting rule and the related equitably-provided rule. The two underlying purposes of the no-supplanting rule are that:

- Title I funds are to be used only for supplementary or extra services.

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*P.L. 95-561 adopts this retention rule formerly found only in the Title I regulations. It thus would not cover the situation of a child who had "attained a level of achievement appropriate" for his or her age, but needed the summer instruction to maintain the gains. Since allowing a child no longer technically "educationally deprived" to participate would violate present law, a statutory change either exempting summer programs from this rule (e.g., if the child had participated in the previous year), or allowing participation for 2 to 3 years even if the child was no longer technically "educationally deprived" would be required. In addition, P.L. 95-561 allows for continued participation of a child in a Title I program even though he or she has been transferred to a non-Title I school during the "school year." This was done to deal with situations such as the implementation of a desegregation plan during mid-year. Such situations would be even more likely to occur between the regular school years and thus application of this provision to students transferred during the summer would be useful.

- Title I schools and children must not be discriminated against or penalized in the application of state or local monies by virtue of their participation in the program.

From these purposes, there developed a companion rule first known as the "ordinarily provided," more recently, the "equitably provided," provision. Under this rule, where the district pays for a particular service out of state or local funds, the district must ensure that state or local funds available for this service are being applied equitably between Title I and non-Title I attendance areas, before Title I funds may be used to provide these services.

Although these rules were developed with the regular school year in mind, they apply with equal force where summer Title I programs are being operated. The rules presuppose the existence of state or local funds and their use in some proportion for academic purposes. Given the requirement that all children must attend school during the regular school year, it can be assumed that each Title I student is entitled to some state/local contribution to his or her education. The two most distinguishing features of summer school, however, are that (1) neither school operation nor student attendance is required by law, and (2) summer school does not necessarily provide instruction in academic subjects. Since, as discussed in Chapters II and III, states differ vastly in the approach they take to the mounting of summer programs, special consideration must be given to the application of these rules when a district decides to undertake a Title I summer program.

The initial question to be asked in applying the equitably provided rule is whether the district's proposal anticipates using Title I to pay for services of the same type as are provided by state or local funds. This, in turn, raises the question, What is "the same type of services"? Three general variations in types of summer school that may be supported with state or local funds may be stated:

(1) Summer school offering remedial services.

(2) Summer school offering other kinds of academic coursework.

(3) Summer school offering nonacademic services such as recreation.

In general, "same type of services" in this context has been interpreted to mean academic services for which Title I participants would be eligible. Thus the rule would apply to type 1 summer school but not type 3.* The equitable provision requirement would apply to type 2 (nonremedial academic coursework) summer school where Title I participants would be eligible for the services provided with state or local funds. For example, general instruction in reading, math, or language arts would invoke the rule, whereas advanced algebra or physics would probably not.

In cases where the equitable provision rule does apply, the district must determine whether the same type of services are being provided with state or local funds, as are proposed for payment by Title I. If so, the district must provide the same level of services to children in Title I areas as is provided to children in non-Title I areas. As stated, this requires a pro-rata allocation among target areas and nontarget areas.

To summarize the application of both the no-supplanting and the equitably-provided rules, the following example is provided:

> One hundred children in District A qualify for the locally funded academic summer school program. These children are distributed throughout the district such that 40 are in Title I areas and 60 are in areas not eligible for Title I. The district has $1000 of local money available for the program. Of this, $800 is spent in non-Title I areas, and $200 is spent in Title I areas:

District A

Title I Areas	Non-Title I Areas
40 qualifying students	60 qualifying students
$200 state/local contribution	$800 state/local contribution

> If the district is now to embark on a Title I summer program, and the equitably-provided rule applies to the district program, the following would apply:

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*Although Title I participants could not be precluded from participation in the nonacademic activities because of their participation in the Title I program.

Under the no-supplanting rule, the district could not remove the $200 it had been spending, since to do so would penalize the Title I areas for their participation in Title I and the Federal money would replace state or local money.

Under the equitably-provided rule, not only could the $200 not be taken away but the district would either have to redistribute the $1000 to equal the distribution of qualifying students (i.e., another $200 or a total of $400 in Title I areas and $200 less or a total of $600 in non-Title I areas) or the district would have to come up with extra funds for the Title I areas to make a 40/60 match (i.e., another $330 for Title I areas to make the distribution $430/$800 or 40/60).*

Our survey of the states (Section II) revealed that 17 provide money to LEAs for general support of summer schools; these 17 states would be subject to the application of the rules shown in the example. Other states provide funds for non-academic summer school activities such as recreation; these states would not be subject to the rule. At present, 26 states provide no state funds for summer schools; for districts in these states, the rules would apply only where academic summer school for which Title I students are eligible is offered with local funds.

Thus, as the rules now stand, they could apply differently to different districts within the same state. Furthermore, states and districts that had been operating qualifying summer programs with state or local money would, at least from the local perspective, be treated unfairly under Title I compared with those districts that, having no existing program, would not have to make or worry about a local contribution. The aim of Federal policy in this area should be to reduce the differential impact of the equitably-provided rule in different situations and to encourage, insofar as possible, the maintenance or increase of local funds for academic summer school programs.

If the rule were applied to academic summer school with no change, it would not motivate the development of locally-supported programs in those states that have none. That is, the undertaking of a local

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*The equitably-provided rule would similarly constrain the district from spending the entire $1000 in non-Title I areas and using its existing Title I monies for summer school in the Title I areas.

contribution for summer school would invoke the application of the equitably-provided rule and, at minimum, add something for local officials to worry about. Where summer programs now exist, the equitably-provided rule could require, as our previous example showed, either a diversion of local funds from nontarget areas or an allocation of extra local funds. The first of these changes would probably have too high a political cost and the second would probably be impossible without new local monies.

Political and financial costs could be minimized for the SEAs and LEAs if summer school were simply exempted from the equitably-provided rule. Without the rule, however, a growing proportion of local funds might drift to nontarget areas and result in increasing inequities--a result antithetical to current Title I policy in general--and an unqualified waiver of the rule could spark concern that the categorical nature of Title I would be seriously undermined by further waivers and exemptions. It is arguable that the problems involved in enforcing equitable provision for summer school outweigh the benefits. Diversion of funds would reduce services to children in nontarget areas, while finding new money (the $330 in our example) could be impossible, particularly where summer schools are presently run on monies left over from the school year.*

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*New amendments to ESEA Title I would deal with an aspect of this situation. Under Section 132 of P.L. 95-561, special provision is made for states or districts with compensatory programs similar to Title I according to set criteria. Under this provision where the combined Title I and state compensatory education (SCE) contribution to children in eligible attendance areas equals the amount a district would receive were Title I fully funded, additional SCE funds may be used in nonproject and ineligible attendance areas until the per participant expenditure in ineligible areas equals the combined total in project areas. Assuming that a district eligible for this exemption could continue to use it for summer programs, i.e., that the fully-funded amount need not be recalculated for the summer activities, the effect would be a "suspension" of the equitably-provided rule until per participant expenditures in ineligible areas had been equalized with those in project areas. This provision would encourage the development of SCE-funded summer school for qualifying states and districts, while providing an incentive for other states to expand SCE efforts.

Conclusion

In light of the diversity across states in the provision of summer school, and assuming that Title I summer school is encouraged by Federal policy, the effect of present Title I rules on such programs should be addressed early on to avoid the difficulties likely to arise. As discussed in this section, the need exists to consider a slight liberalization of student selection and retention rules, as well as some modification of the equitably-provided rule to assure maximum incentive to development of what is at present a fledgling activity among the states.

VII CONCLUSIONS

Synthesizing the information from the national, state and local levels, the following picture of current practices in Title I summer programs emerges. Nationally, fewer than 15% of all Title I districts have Title I summer programs and this figure appears to be on the decrease. With increasing costs, the summer component is one of the first things to go, although a few districts value them sufficiently to shorten the length of their summer program rather than abolishing it completely.

Title I summer programs range from those that provide a highly academic, six-hour a day program to those that emphasize day camps and field trips, with almost all the programs more like the former than the latter. Based on local program applications, we conclude that almost all programs claim to be academic and this claim was verified through site visits to 11 districts. The programs average five or six weeks in length and generally run from two to four hours per day. The majority of programs serve students in some or all of grades one through six.

We found that summer programs generally provide as much or more Title I instruction per day than school-year Title I programs, frequently at less cost per student per hour of instruction although there is large variation in these figures. While these figures are quite rough, they do show at minimum that summer programs are not more expensive than school-year Title I programs.

One of the main problems encountered includes reaching all the students recommended for participation in the summer program. Districts need to develop strategies to attract these students to summer school; particularly older students. Similarly, coordination of the summer program with the preceding and following school-year programs is a key element which poses a challenge to Title I staff--but one which is generally recognized. An additional problem is that summer programs tend to be staffed by non-Title I teachers often resulting in a staff unfamiliar with the students.

Our analysis of the Title I law and regulations pertaining to the operation of summer programs concludes that although summer school activities have on several occasions been identified as operating out of compliance with Title I rules this need not be the case. Rather, Title I programs may be undertaken during the summer months without running afoul of the Title I legal framework so long as sufficient attention is paid to the special application of these rules--particularly those pertaining to student selection and to the prohibition against supplanting.

Although we did not measure the impact of the summer programs, the impressions gleaned from staff and students were generally positive. Summer school is viewed as a way of providing intensive instruction which at the least is judged to keep students from falling further behind. It is also viewed as a way of improving the attitudes of students towards school and hence their motivation. Teachers also noted that a difference could be seen in the fall between students who had and had not participated in a summer program. Finally, with a few exceptions, summer programs provide a pleasant environment for students both in terms of facilities and atmosphere.

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